

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

RELENTLESS, INC., et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
U.S. DEPARTMENT OF COMMERCE,	:	Civil Action No. 1:20-cv-00108-WES-PAS
et al.,	:	
	:	
Defendants.	:	

**STIPULATION AND PROPOSED ORDER SETTING BRIEFING SCHEDULE**

Counsel for the parties have met and conferred and jointly propose the following to the Court for the purpose of scheduling and other matters regarding disposition of this case. The parties respectfully request that the Court endorse and adopt the following proposed schedule for the briefing of motions by the parties:

1. The parties have met and conferred and have resolved any issues related to the contents of the administrative record without the need for motion practice. *See* ECF No. 31.
2. The parties propose the following briefing schedule:
  - a. Plaintiffs will file their motion for summary judgment and supporting memorandum by December 4, 2020, and their memorandum will be no more than 40 pages;
  - b. Defendants will file their cross-motion for summary judgment/opposition to Plaintiffs' motion for summary judgment and supporting memorandum by January 15, 2021, and their memorandum will be no more than 45 pages;

c. Plaintiffs will file their opposition to Defendants' motion for summary judgment/reply memorandum in support of their motion for summary judgment on January 29, 2021, and their memorandum will be no more than 30 pages;

d. Defendants will file their reply memorandum on February 12, 2021, and their memorandum will be no more than 25 pages.

3. In light of the nature of this action, the parties agree that review of Plaintiffs' claims is confined to a closed administrative record, filed with the Court as ECF Nos. 21-30 and 32 on September 11, 2020, and ECF No. 33 on October 27, 2020. Given that the Court's review is of the administrative record, the parties respectfully request that the Court relieve them of the obligation to file Statements of Undisputed and Disputed Fact under Local Rule Civ. 56.

Stipulated and agreed to by the parties, through their respective counsel, this 30th day of October, 2020.

/s/ Kevin J. Holley (with permission)

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Attorneys for Defendants

SO ORDERED:

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Honorable William E. Smith  
United States District Judge

Dated: \_\_\_\_\_, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ Alison C. Finnegan